

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE**

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IN RE:

BRENDA FAYE STANDBACK

CASE NO. 12-26614-DSK  
CHAPTER 13

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**MOTION TO DELETE CREDITOR (SELECT PORTFOLIO SERVICES),  
REDUCE PLAN PAYMENTS**

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**COMES NOW, BRENDA FAYE STANDBACK**, Debtor, and moves this Court for entry of an Order Deleting Creditor (Select Portfolio Services) from debtor's plan, and Reduce Plan Payments accordingly, and states as following:

1 That the debtor and her sister are listed on the property being serviced by Select Portfolio Services as Joint Owners.

2 That the Debtor petitions the Court to allow her to delete the claim of Select Portfolio Services Citizens from her plan because the mortgage on this property is being paid outside of her plan. By bank draft from her sister's account.

3. That the Debtor has provided documentation that confirms that the account is being serviced by bank draft petitions that the Creditor, CITIZENS AUTO FINANCE'S, lien be satisfied with proceeds from her sister's account at First Tennessee Bank and therefore, should be deleted from Debtor's plan.

4. That because this additional amount of money has been coming out of the Debtor's paycheck, she has been unable to meet her ongoing monthly obligations .

**WHEREFORE, premises considered, Debtor prays:**

1. That this Honorable Court set a hearing for this matter and after a hearing enter an Order allowing the Deletion of Creditor (Select Portfolio Services).

2. That the Court reduce Debtor's plan payments accordingly.
3. That the Trustee adjust the Debtor's plan to comply with the terms of this Motion.
4. For such other and further relief as this Court deems proper.

Respectfully submitted,

/s/ Jerome C. Payne

Jerome C. Payne ( 016243)

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**CERTIFICATE OF SERVICE**

I, Jerome C. Payne, hereby certify that I have mailed a copy of the foregoing document via U.S. Mail, postage pre-paid and/or electronic mail, on this the 14<sup>th</sup> day of December, 2012, to the parties listed below:

/s/ Jerome C. Payne

**Jerome C. Payne**

Debtor

Debtor's Attorney

Trustee

Creditor's Attorney